

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

STEVEN WELLS, )  
                    )      **No. 08 C 598**  
Plaintiff,        )  
                    )  
vs.                )      **Judge Shadur**  
                    )  
CITY OF CHICAGO, ILLINOIS,     )  
CHICAGO POLICE OFFICER        )      **Magistrate Judge Mason**  
LIONEL PIPER, Star No. 14650,    )  
CHICAGO POLICE OFFICER WEST,    )  
Star No. 8589, and CHICAGO POLICE    )  
OFFICER BROWN, Star No. 19615,    )  
                    )  
Defendants.        )

**DEFENDANT CITY OF CHICAGO' S CERTIFICATION OF INDEMNIFICATION**

Defendant City of Chicago, by its attorney, Mara S. Georges, Corporation Counsel,  
hereby certifies to the following:

1. The City of Chicago agrees to indemnify the individual defendant Chicago police officers for any judgment of compensatory damages that may be entered against them in this case. This agreement is both unconditional and irrevocable.
2. If plaintiff prevails in his section 1983 action against the individual defendant Chicago police officers, the City of Chicago agrees to indemnify the individual defendants for reasonable attorney fees and costs that plaintiff may be entitled to recover pursuant to 42 U.S.C. § 1988. This agreement is exclusive of such fees and costs that may be attributable to an award of punitive damages against the individual defendants.

3. The City also undertakes to pay nominal damages (not to exceed one dollar) if any compensatory damage award is entered against the individual defendants.

Respectfully submitted,  
MARA S. GEORGES  
Corporation Counsel of the City of Chicago

BY: /s/ Meghan K. Kennedy  
Assistant Corporation Counsel

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